

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MARILYN DONALD and CHARLES
DONALD, as next of kin and personal
Representatives of MARCUS DONALD,

Plaintiffs,

vs.

Case No.: 2:23-cv-02738-TLP-atc

FLOYD BONNER, Jr.; KIRK FIELDS;
TERRI PARKER; FILMORE VARNER;
T. JOHNSON; D. "HOT ROD" ROBERTSON;
G. SMITH; T. BAKER; DONTREAL HAWKINS;
KIMBERLY WALLACE; BRENDA
MCCOY f/k/u GRANDBERRY; and the
GOVERNMENT of SHELBY COUNTY,
TENNESSEE,

Defendants.

AGREED MOTION FOR A PROTECTIVE ORDER

The individual Defendants and the Plaintiff, pursuant to Rule 26 of the Federal Rules of Civil Procedure, move this court for an order allowing Plaintiff limited discovery as set out in the Agreed Protective Order attached as Exhibit "A" to this Motion. Neither Defendant Bonner nor Shelby County, Tennessee oppose this motion.

WHEREFORE, PREMISES CONSIDERED, the Parties request that the Court enter the Protective Orde, attached as exhibit "A" allowing Plaintiff limited discovery.

Respectfully submitted,

GLANKLER BROWN, PLLC

By: /s/ Robert D. Meyers

Robert D. Meyers (TN #12187)

Aubrey B. Greer (TN #35613)

6000 Poplar Ave., Suite 400

Memphis, Tennessee 38119

Telephone: (901) 525-1322

Facsimile: (901) 525-2389

rmeyers@glankler.com

agreer@glankler.com

Attorneys for Defendant, Timothy Johnson

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served electronically on the following via the Court's ECF system, this the 11th day of June 2024:

Jacob Webster Brown, Esq.
Sara Katherine McKinney, Esq.
Apperson Crump, PLLC
6000 Poplar Avenue, Suite 150
Memphis, Tennessee 38119
jbrown@appersoncrump.com
smckinney@appersoncrump.com

Benjamin Crump, Esq.
Ben Crump Law, PLLC
633 Pennsylvania Avenue Northwest, Second Floor
Washington, D.C. 20004
ben@bencrump.com

Attorneys for Plaintiffs

Allan J. Wade
Brandy S. Parrish
The Wade Law Firm, PLLC
5050 Poplar Avenue, Suite 1028
Memphis, Tennessee 38157
awade@thewadefirm.com
bparrish@thewadefirm.com

Attorneys for Defendant, Floyd Bonner, Jr.

/s/Robert D. Meyers